Exhibit 2

FILED UNDER SEAL

25   Q   And how is that analysis recorded within

1261

1   the Rightscorp system?

2   A   What do you mean recorded?

3   Q   Well is there then a flag set somewhere for

4   which IP addresses have which bit fields populated?

5   A   Let's work with an example.

6   So IP address 127.001 comes through and has

7   no bit field. This process compares it, says, Eh.

8   Nothing is generated.

9   69 -- 169 -- 192.168.2.1 comes through, and

10 it has a full -- bit full pay load for that Torrent

11 hash. And it goes through and compares and

12 populates. 10.0.0.1 comes through, and it's got

13 these ten here, these seven here, these four here.

14 It compares where it gets a match, it populates,

15 where it doesn't get a match, it doesn't.

16   Q   In that last example when you say it gets a

17 match, is it matching the portions of the bit field

18 reported by the BitTorrent client as being available

19 with the portions of the bit field that relate to

20 songs that Rightscorp is attempting to find?

21   A   Yes.

22   Q   And that exercise that you just described

23 results in detections; is that correct?

24   A   Correct.

25   as planetary go Vasquez Gorman we mix. The file

1332

1   name is Demo201216 kids from yesterday, 06 planetary

2   go. Boom.

3   Q   If an ISP wanted to, how would it go about

4   determining whether this is a legitimate notice

5   relating to an instance of actual infringement?

6   MR. O'BEIRNE: Hold on. Objection. Vague.

7   THE WITNESS: How would they decide to do

8   that? If an ISP wanted to contact us and work with

9   us and get some deeper information, I'm sure it can

10   be done.

11   BY MR. BROPHY:

12   Q   How?

13   A   By contacting us and saying can you provide

14   some information. But then I'm passing my scope of

15   business. I am technical.

16   Q   So are you aware of any way other than

17   approaching Rightscorp that an ISP could verify the

18   accuracy of the infringement notice identified as

19   Exhibit 5?

20   MR. O'BEIRNE: Objection. Scope.

21   THE WITNESS: Right now? No.

22   BY MR. BROPHY:

23   Q   How would an ISP go about identifying the

24   registration number for the copyright that is

25 alleged to have been infringed by Exhibit 5?

1333

1   MR. O'BEIRNE: Objection. Outside the

2 scope.

3   THE WITNESS: Definitely outside my scope.

4 BY MR. BROPHY:

5   Q   Are you aware of any way?

6   MR. O'BEIRNE: Same objection.

7   THE WITNESS: Outside my scope.

8 BY MR. BROPHY:

9   Q   Is that a "no"?

10   MR. O'BEIRNE: Same objection.

11   THE WITNESS: I'm not legal DMCA lawyer I'm

12 not a copyright lawyer.

13 BY MR. BROPHY:

14   Q   So I'm just asking if you have any personal

15 knowledge of a way an ISP could identify the

16 specific copyright or registration associated with

17 this notice of infringement?

18   MR. O'BEIRNE: Objection. Outside the

19 scope.

20   THE WITNESS: Well, do I have any personal

21 knowledge that hasn't been tried or ever unified or

22 thought of never tried to personally do it myself so

23 I don't have any personal knowledge.

24   MR. BROPHY: Okay. I have maybe just two